#### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

IN THE MATTER OF THE SEIZURE OF ALL FUNDS ON DEPOSIT IN REGIONS BANK ACCOUNTS 2916 and 1351

Case No. 25-M3-34-B

Filed Under Seal

## AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEIZURE WARRANT

I, Emily Platt, being first duly sworn, hereby depose and state as follows:

# PROPERTY TO BE SEIZED

- This affidavit is made in support of an application for a seizure warrant for all funds on deposit with Regions Bank in account number 2916, held in the name of Kelley Williamson and Jennifer James, and Regions Bank account 1351, held in the name of Kelley Williamson.
- There is probable cause to believe that the funds in said bank accounts include proceeds of violations of a specified unlawful activity, namely, proceeds of violations of 18 U.S.C. §§1344(2), Bank Fraud. As such, the funds on deposit in said Regions Bank accounts are subject to seizure and forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(C), and 984.

# INTRODUCTION AND AGENT BACKGROUND

3. I make this affidavit in support of seizure and forfeiture of funds on deposit held in the subject accounts at Regions Bank, headquartered in Birmingham, Alabama. The funds on deposit in the accounts to be seized and the evidence to support the seizure are described in the

following paragraphs. This affidavit is made in support of an application for a seizure warrant under United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 984.

- 4. I am a Special Agent with the United States Secret Service ("USSS") and have been since July 22, 2019. I graduated the Criminal Investigative Training Program ("CITP") at the Federal Law Enforcement Training Center ("FLETC") in November 2019 and JJRTC in February 2022. As part of my USSS training, I took a Basic Investigation of Computer and Electronic Crime ("BICEP") course, went to National Cyber Forensics Institute ("NCFI"), and had training in identifying and working counterfeit, fraud and money laundering cases. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show only that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.
- 5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. §1344(2), Bank Fraud, have been committed by **Kelley James Williamson** ("Williamson"). Therefore, the subject account's funds are subject to seizure and forfeiture to the United States pursuant to 18 U.S.C. Sections 981(a)(1)(C) (forfeiture of proceeds of "specified unlawful activity", including violations of §1344(2), as specified in 18 U.S.C. §1961(1)) and 984 (civil forfeiture of fungible property).
- 6. The information in this affidavit is based on my personal knowledge, as well as information provided by other law enforcement agents, bank representatives and other private businesses, and my review of documents obtained during the course of the investigation. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

## **SUMMARY OF PROBABLE CAUSE**

- 7. On 12/19/24, Irving Silver, an attorney for Crowder Gulf, contacted the USSS Mobile Resident Office ("MOB"), to report fraud by Kelley Williamson ("Williamson"). Crowder Gulf is a debris cleanup company located in the USSS MOB district. Silver said that Crowder Gulf employee, Williamson, had stolen approximately \$1.5 million dollars from Crowder Gulf. Mr. Silver said that Williamson had unlimited access, without oversight, to Crowder Gulf's bank accounts. Williamson was employed as Crowder Gulf's Office Manager, though she had additional titles of "Accounts Payable" and "Payroll". According to Silver, Williamson worked for the company for approximately 20 years. Williamson's sister, Jennifer James also worked for the company as a data analyst. According to a copy of James employment record with the company, James had a history of fraudulently accounting her hours. This led to her termination on 11/15/2024.
- 8. On 11/15/2024, the Controller for Crowder Gulf, Lauren Bell, saw unauthorized payments in the CG Leasing, LLC's ("CG Leasing") account ending in 1154. CG Leasing is owned by Crowder Gulf. There were eight fraudulent and unauthorized checks all made payable to Kelley Williamson. Ashley Ramsay-Naile's signature is only authorized for business use, and she has told Your Affiant that she did not sign the checks which purport to bear her signature. Williamson wrote these checks between May 2 and November 13, 2024, which totaled \$222,500.00. All checks were deposited into Regions Bank account ending in 2916 held by Williamson. Lauren Bell, as Crowder Gulf's Controller, has access to payroll files, and searched for Williamson's pay stub and confirmed this is the same account she received her pay checks. According to Ms. Ramsay-Naile, Williamson wrote checks payable to herself on CG Leasing's account using QuickBooks check stock and utilized her signature stamp, which she kept under

lock and key. Ms. Ramsay-Naile said she neither authorized the checks nor the use of her signature stamp. The total loss amount for CG Leasing is \$222,500.00.

9. Ms. Bell said that in Williamson's termination interview, she admitted to stealing

CK#	Date	Amount	CG Lensing LLC	Page 1
7008	5/2/2024	7,500	CG Landling LLC Mile Carroline Brid Spet Recibe AL 2001 + 391-460-4000	899024
7009	5/9/2024	60,000	Fac 10 1HF Kelley Williamson Stoty Thousand and 00/100	\$ *46,000 00
7015	6/14/2024	45,000	Kelley Williamson (APACING) A 10258 Grady Lane	A A
7017	10/4/2024	5,000	Mcbile AL 30895	labley Kamony No.
7018	10/4/2024	35,000		31354*
7019	10/8/2024	5,000	20240603118414761852 03 1631 Regions Bank >062000019<	,
7020	11/1/2024	10,000		·
7023	11/13/2024	55,000	26240803119414761862 CS 1636 Regions Bank >062020319-	TA NGT Johnson
		606 700	W	1
	[80 Bee	222,500	**	

Fig. 1 & 2 Eight fraudulent checks deposited at bank account 2916 and copy of one of the fraudulent checks.

funds from Shady Grove Land and Timber Co., LLC ("SHADY GROVE"). This account is separate from Crowder Gulf and is a Ramsay Estate-owned business. It was involved a project of the late founder of Crowder Gulf, John Ramsay. On 11/22/2024, Ashley Ramsay-Naile, emailed Regions Bank and requested copies of the checks from CG Leasing and statements from Shady Grove dating back to its inception in 2013. Regions returned an excel file filtered for only transactions to accounts with account name Kelley Williamson.

10. In all, there was 211 electronic transactions between December 2017 and May 2023, which totaled \$1,199,000. A representative from Regions Bank said it could not go back further than 2017 for digital bank statements for Shady Grove. Despite Regions Bank's lack of digital files before 2017, it had some original bank statements from the Shady Grove account from 2013. A January 2013 bank statement shows two unauthorized \$5,000 ACH wires. This is consistent with **Williamson's** fraudulent payments to herself, as she often wired herself increments of \$5,000, \$7,500, \$3,500 or \$2,500. A comparison of the original bank statements with the ACH payments file Regions provided, Ramsay-Naile said that the only transactions done through the Shady Grove account in ACH form were **Williamson's**. The legitimate transactions in the account are distinguishable from **Williamson's** ACH transactions. The total known loss amount is \$1,199,000.00.

COMPANY HAME	~ COMPANYIO	× ODFITE	. ENTRY DESC	- RETHO FILE/BATCH	Y PARNO	TC .	BOUTING1	- ACCOUNT	- AMOUNT	CUST NAME	· TRACE	- POINT	~ APPL	* ROUTING2	* DATE	* TIME *
SHADYORDVELANO	1463542765	6620-0002	CORPRAY	18341 (40045) 0000135	\$6753753795	32-CSN	562000019	00000000173591251	75000	KELLEYWALCAMSON	0400002	9FOST	BANK 001	052000019	2018-12-0	2600
SHADY GROVE LAND	1483842755	0620-0001	CORPPAY	18334796093/6000120	005425073	32-CSN	962666019	00000000178591351		KELLEY WILLIAMSON	0000002	98087	BANK COL	062000019	2019-12-0	
SHADY GROVE LAND	1465642755	0620-6001	CORPERY	18324000408/0000275	616874069	32-C5N		60000000173591351	-	KELLEYWILLIAMSON	6000002	SPOST	BANK 001	062000319	2013-11-2	
SHYDY GLUCKE TYREE	1453542755	0620-0061	CORPPAY	18119000085/000177	996488937	32-CSM	062000019	70000000172591351		KELLEYWALLAPSON	0000003	SPOST	BANK 001	082000018		
SHADYGROVELAND	1453642755	0620-0081	COMPRAY	13306500000000000035	699597081	32-DSN	052000019	000000000173591351		KELLEYWELDANSON	0000002	SPOST	2ANK 001	082006019	2018-11-1	
SHADYGROVE LAND	1463642755	0620-0001	CORPPAY	10298000221/0000068	009701292	32-CSN	062000019	00000000017/8/91351		RELIEVWILLIAMSON	0.000,000	99057	SANK GOT	062000019		
SHADY BROVE LAND	1468542755	0825-0001	CORPPAY	1529100000770000179	003973262	32-C3H	062009619	0 00000003 73531351		KELLEYWALIAMSON	8000002	SPUST	SANK 901	662660019	2019 39-2	
SHADY GROVE LAND	1481842755	0630-6801	<b>CORP PAY</b>	1828400000570000235	005129358	32-CSN	082000019	000000000173591251		KELLEFWILLIAMEON	9900002	27057	SANK GOT	062000019	2018 10-1	
SHADY GROVE LAND	1453642755	8626-0001	CORPPAY	18277 000355;0000256	009296091	32-CSN	062000019	000000000173591351		KELLEYWELIAMSON	1000002	SPOST	BANK GOT	062300019	2018-10-1 2018-10-0	
SHADY GROWE LAND	1450542755	6620 GFG;	CORPRAY	16260 000229/0000078	903419510	32-CSN	082000016	000000000170561351		KELLEY MILITAYS ON	0000000	99067	BANK 001	062000019		
SHADYGRONELAND	1460842755	0626-0001	CORPRAY	19249@60295@0000244	005110240	32-CSN	362000019	000000000173591351		*ELLEYVILLIAMSON	8000002	SPOST	1000000		2018-09-20	
SHADY GROVE LAND	1461642756	0620-0001	CORPEAY	18241 000089/0000293	009007545	32 CSN	052000019	000000000172591351		KELLEYWILLIAMSON	0900002	9700F	BANK GG1 BANK GG1	662000019	2018-09-00	
SHADYGROVELAND	1461842755	0526 6001	CORPPLY	18235-000349-0000276	607906178	32-09N	062600019	000000000178591351		KELLEYNYRUMANSON	0600002	SPOST	-	062000015	2018 63 23	
SHADY GROWE LAND	3061642755	0620-0001	(2)8P PAY	18221000344:0000190	014015348	32-C9N	062600019	30000en00173891251		KELLEY MULAMSON	0000003	9POST	84HK 001	052000019	2018-03-2	
SHADY SHOWELAND	1460642755	6620-0001	COMPRAY	18214 000245 96000002	006112698	32-054	062000019	000660006173691361		KELLEY WILLIAMSON	6860662		BANK 801	0620000159	2018-05-05	
SHADYSPOVELERD	1462642755	0828-6001	CORPRAY	182071/00324/0000190	914885995	22-CON	962000019	90000009011607916		KELLEYWILLIAMSON	5000002	SPOST	SANK OO1	062000013	2018-02-02	
SHADY GROVE LAND	1483842755	9820-6011	CORPERY	18196/00493/0000224	021717602	22-CDN	062000019	300000003001502918		KELLEY WALKAPSON	8000003		BANK 001	062000019	2018-07-26	
SHADYGROVELAND	1468642755	0820-0001	COMPRAY	1317800030770069341	014517828	22 000	062000019	000000000004602916		KELLEY WILLIAMSON		SPOST	SANK DOI	062000019	2019-07-05	
SHADY GROVE LAND	1463642755	0620-0001	CORPHAY	18170000840000118	011634175	22-COM	062060019	100000000000000000000000000000000000000			00/00/02	9FOST	BANK GOI	062000019	2018-06-27	
SHADYGROVELAND	1463642755	8620-6001	CORPPAY	13165000263/60/00/2	060574490	22-CDN	062000019	M0000601001802916		KELLEYWILLIAMSON	0000002	POST	99NK 001	082000019	2618-05-22	
SHADYGROVELAND	1463642765	0620 0001	CORPPAY	15157 000854044420	005839989	22 CON	062000019	000000000000000000000000000000000000000		KELLEYWILLIAMSON	0600003	99087	BANK 601	062000019	2018-08-14	
SHADY GROVE LAND	1460642755	0620-0002	CORPAY	18150 000354 0000105	005295882	32-CSN	662000619	1 7 CO CO CO 1 7 CO		RELLETWILLIAMSON	6306091	9057	Bankodi	062000019	2019-06-06	
SHADYOROVELAND	1463642755	9830-8001	CORPRAY	18144500080.6060155	0002911102	22-CSN	082000019	U00000000173591951		KELLEYWILLIAMSON	0000002	SHOST	SANK 001	962000319	2018-05-30	
SHADVGROVELAND	1460042755	0620-0001	CORPPAY	18138000089/0000215	007480418		062000019			VETTERMETIMATION	0900003	3F05T	BWK 60.7	1/62000019	2018-05-24	
SHADY GROWE LAND	1453642755	0620 0001	CORPRAY	181.0000032 0000201	005650692		062000019	000000000173591351		KELLEYWELLAMSON	6000002	SPOST	BANK BOI	062000019	2019-05-18	
SHADY GROVE LAND	2460642755	0620-0001	CORPAY	101200001920000146	022057296	32-CSN	062000019	0000000001795+1.51		VELLEY MELIAMSON	0000002	98097	BANK DOT	062000019	2018-05-10	
SHADY GROVE LAND	1463642755	0620-0601	CORPEAY	18109000085/0000261	011466916		062000019	0000000000173591351	480253	KETTEAMSTTWKROM	0000002	SPOST	DANK GC1	982000019	2018-04-30	
SHADY GROWE LAND	1463642755	0620-0001	CORPEAN	18095 000/80/0000169	107394863	32 CSN 32-CSN		000000000171591351		ELLEY WILLIAMSON	0000000	SPOST	BANK 001	062006015	2012-04-19	
SHADY GROVE LAND	1453842755	9620-0001	COPPPAY				062660019	00000009178591351		KETTEAMATTANIEON	1000003	9 <del>2</del> 057	Sank (d)	052000019	2018-04-65	
SHADYSROVELAND	1463642755		CORPEAY	16060000170000138	020046357	32-CHN	062000019	00000000173501251		KELLEYWILLEMSON	0900002	SPOST	BANKOU1	062000019	2018-03-29	
SHADY GROVELAND	1463642765	0820-0001	1000	18079000085/0000140	008365724	32-CSN	062000019	00000000173591051		KELLEYNYLLIAMOON	0000002	9POST	BANK DD1	062000019	2018-03-20	1930
SHADY GROVE LAND		0620-0001	CORPPAY	19067 000221-0000075	006694924	32-CSN	962000019	000000000173591351		KELLEYWILLIAMSON	0000002	9POST	BANK OGT	062000019	2018-03-09	1206
	1453642755	0820-0011	CORPPAY	18060 040236.0005056	010535706		062000019	00000000173591351	7.500.00	KELLEY WILLIAMSON	9000093	<b>GPOST</b>	BANK GOT	@1000HSS0	2019-03-01	1200
SHADYGROVELAND	1469542756	0620-000:	PANHENTS	18047000035/600075	005496009		062000019	00000000173591251	7,500.00	KELLETWILLSMSJH	0002174	9POST	BANK 001	062000019	2018-02 15	1030
SHADY GROVE LAND	1463842755	0620-0001	PARMENTS	18039000461/0000065	916365576		062000018	00000000133591351	7500.00	KELLEYWILLIAMSON	005801	SPOST	9ANK 001	082000018	2018-02-08	1800
SHADY GROVELAND	1453842755	0620-0001	PARMENTS	188120602405000052	(10926)654		962000019	000000000173591351	5,000,00	KELLEYINLUAMSON	0009096	99057	BANK (60)	082000019	2018-02-01	
SHADY OF CHAD	1489542755	0620 6001	PAYMENTS	15018000489-0000044	(14855947	32-CSN	063000019	000000000173591351	7,500,00	RELLEYWILLIAMSON	0054270	99097	BANK CO1	062000049	2019-01-18	
SHADY GROVE LAND	1460642758	0620-6001	PAIMENTS	19011000933/0000105	009430431	32-C9N	062009019	07/00/00/01/2501351	7,500 00	KELLETWELLANSON	6014520	SPOST	SANK DOL	062000019	2018-01-11	
SHADY GROVE LAND	1463642755	0030-0001	PAYMENTS	180541100484000077	006552565		062000019	900000000173591251	7,500.00	KELLEYWELIAMSON	0948191	SPOST	BANK 001	062600619	2018-01-64	
SHADYGROVELAND	1463642765	1620-0001	PAYMENTS	17355000033/0000022	206003255	32-CSN	0620000119	790/00/00/01/73591351	5,009.00	KELLEYWOLLGAMSON	0001919	SPOST	BANK 001	082800019	2017-12-22	
SHADYGROVELAND	1452642755	0620-0001	PAYMENTS	17349000342/0070048	025789680	32-CSN	052000019	ENGROOM 00173561351	5,000.00	NELLEY MELLANSON	0620458	SPOST	BANKOUT	062000019		
SHAEN SHOVE LAND	1463642755	0620-0001	Payments	173390000037,0000058	005145046	32-CSN	062000019	0000000000173591351	7,469.00	KELLEYVYLLISMSON	0005600	92097	BANKBO1	662666019	2017-12-05	

Fig. 3 Regions bank statements showing unauthorized wires from Shady Grove to Williamson's two bank accounts 2916 and 29151.

01/30	Shady Grove Land Payments Shadygrov -Sett-Tms ACH	
01/30	Intuit Payroll S Quickbooks Shady Grove LA 463642755	
01/31	Shady Grove Land Payments Shadygrov -Sett-Tms ACH	
01/31	Intuit Payroll S Quickbooks Shady Grove LA 463642755	
01/31	Intuit Payroll S Quickbooks Shady Grove LA 463642755	

5,000,00 594.50 5,000.00 539.66 1.45

Total Withdrawais

\$195,473,34

Fig. 4 January 2014 Regions Bank Statements show two \$5,000 ACH wires

	WITHDRAWALS	
01/03 01/08 01/08 01/10 01/17 01/22	Shady Grove Land Corp Pay Shadygrov - Sett-Tms ACH Hns Hughesnet86 6-347-3292 Shady Grove LA 8931462 IRS USATAXPYMT Shady Grove LA 270040852233763 Shady Grove Land Corp Pay Shadygrov - Sett-Tms ACH Shady Grove Land Corp Pay Shadygrov - Sett-Tms ACH AL-Dept of Rev Direct Dbt Shady Grove LA 1851886464	5,000 00 71,77 263 14 5,000 00 5,000 00
01/24 01/27 01/27	Shady Grove Land Corp Pay Shadygrov -Sett-Tms ACH Dish Network Dish Ntwrk Ramsey, Ashleig Dish Network Dish Ntwrk Ramsay, Ashley	39.34 7,500.00 98.21 107.61

ig. 5 Jan 202	0 Stateme	nts show similar	ACH wire to the	ne January 20	14 Reg	gions Bank	Statement	
SHADY GROVE LAND	062000019	000000000173591351	7,500.00 KELLEYWILLI	AMSON 0000001	9POST	BANK 001	062000019	2020-01-30
SHADYGROVELAND	062000019	000000000173591351	5,000.00 KELLEYWILLI	AMSON 0000002	9POST	BANK 001	062000019	2020-01-20
SHADYGROVELAND	062000019	C000000000173591351	5,000.00 KELLEYWILLI	AMSON 0000001	9POST	BANK 001	062000019	2020-01-16
SHADY GROVE LAND	062000019	000000000173591351	5,000,00 KELLEYWILLI	AMSON 0000001	9POST	BANK 001	062000019	2020-01-09
SHADY GROVE LAND	062000019	000000000173591351	5,000.00 KELLEYWILLE	AMSON 0000001	9POST	BANK 001	062000019	2020-01-02
SHADYGROVELAND	062000019	0000000000173591351	7.500.00 KELLEYWILL		9POST	BANKODI	04000010	2010-12-90

Fig. 6 Jan 2020 Regions ACH File show Williamson's wires are the wires shown on the January 2020 Statement

- 11. Thus far, the total financial loss to Crowder Gulf is currently \$1,422,000.00; the total actual amount of loss is still under investigation.
- 12. Mr. Silver said he interviewed Williamson, during which she admitted to embezzlement from Crowder Gulf. Mr. Silver recorded the interview and emailed me a copy of the recording. In it, Williamson acknowledged that she was not authorized to write checks or wire funds to herself.

# JURISDICTION TO ISSUE OUT-OF-DISTRICT WARRANT

13. If the court issues the requested seizure warrant, Your Affiant shall serve it

on Regions Bank, headquartered in Birmingham, Alabama, within the Northern District of Alabama. Whether Regions Bank considers the funds in the accounts to be situated in the Northern District of Alabama or here in the Southern District, 18 U.S.C. §981(b)(3) expressly authorizes jurisdiction for the issuance of seizure warrants for property located in other districts, providing:

Notwithstanding the provisions of rule 41(a) of the Federal Rules of Criminal Procedure, a seizure warrant may be issued pursuant to this subsection by a judicial officer in any district in which a forfeiture action against the property may be filed under section 1355(b) of Title 28, and may be executed in any district in which the property is found, ...

- Alabama is appropriate under the above statute, as this is the district "in which ... the acts or omissions giving rise to the forfeiture occurred," 28 U.S.C. § 1355(b)(1)(A). As provided in 18 U.S.C. § 981(b)(3), the warrant may be "executed in any district in which the property is found." As stated, § 981(b)(3) authorizes issuance of the warrant in this district even if the funds in the account are in another district.
- Gulf. Your Declarant requested Regions Bank for the current balance of the funds in each account. In the account ending in 2916, the balance is \$14,456.77. In the one ending in 1351, it is \$51,000.78. As stated, there were 211 electronic transactions from the Shady Grove account between December 2017 and May 2023, which totaled \$1,199,000. Because there is a break in available Regions Bank statements between 2013 (when there were two known unauthorized ACH withdrawals by **Williamson**—possibly the beginning of the offense conduct) and 2017 when the

digital statements started, it is impossible for Your Affiant to trace the proceeds from the beginning of the criminal conduct to its end. Under a proceeds of crime theory such as the one proposed here to seize the criminally derived funds commingled with clean ones, ordinarily the United States would be required to trace crime proceeds using funds tracing accounting principles such as those used and discussed in *U.S. v. Miller*, 295 F. Supp.3d 690, 703-707 (E.D. Va. 2019). However, because such tracing is impossible, 18 U.S.C. §984 eliminates that requirement.

#### Section 984(b) provides:

- (b) No action pursuant to this section to forfeit property not traceable directly to the offense that is the basis for the forfeiture may be commenced more than 1 year from the date of the offense.
- 16. In other words, the United States could not use 984 and its rule which relieves it of the funds tracing requirements if the funds can be traced. As stated, because of the break in available statements between 2013 and 2017, it is impossible to trace the criminal proceeds. As a result, §984 applies and eliminates the ordinarily required criminal proceeds tracing.

#### Section 984 provides:

In any forfeiture action in rem in which the subject property is cash, monetary instruments in bearer form, funds deposited in an account in a financial institution (as defined in section 20 of this title), or precious metals—(A) it shall not be necessary for the Government to identify the specific property involved in the offense that is the basis for the forfeiture; and

- (B) it shall not be a defense that the property involved in such an offense has been removed and replaced by identical property.
- Except as provided in subsection (b), any identical property found in the same place or account as the property involved in the offense that is the basis for the forfeiture shall be subject to forfeiture under this section.
- (b) No action pursuant to this section to forfeit property not traceable directly to the offense that is the basis for the forfeiture may be commenced more than 1 year from the date of the offense.

- 17. From my review of the statements for both accounts, it is evident that proceeds of the above crimes are in these accounts and funded Williamson's and James's lavish lifestyles. Both bought newly constructed homes and Crowder Gulf Controller Lauren Bell stated they spent large amounts of money on dining, getting their hair and nails, and other expenses when the sisters worked at Crowder Gulf. Williamson is a member of the LaShe's Mardi Gras organization and is this year's queen. Bell further advised that Williamson is spending at a fast pace. This includes high end dinners, parties, shipping an ice sculpture from New Orleans, and other expenses associated with pageants. Bell was invited to these parties, and while she did not attend, these activities were reported to her from guests. Therefore, time is of the essence to stop the flow of funds from the account for forfeiture—and ultimately—for remission to the victims as restitution.
- 18. Further, Equifax shows high account balances on about 10 credit cards **Williamson** has. In the recorded interview with Silver, **Williamson** stated she was in debt despite her fraud. She stated she uses stolen funds to pay down her growing credit card debt. For example, **Williamson** recently paid \$15,000 on a credit card payment. Therefore, time is of the essence.
- 19. Title 18 U.S.C. §981(a)(1)(C) authorizes forfeiture by the United States "[a]ny property, real or personal, which constitutes or is derived from violations of " of statutes including 18 U.S.C. §1344. As stated, §984 eliminates tracing of criminal proceeds in this case. Section 981(b)(1) and (2) authorize seizures of property subject to forfeiture "in the same manner as provided for a search warrant under the federal Rules of Criminal Procedure, except [in circumstances inapplicable here]."

## **CONCLUSION**

Based on the above facts, circumstances, and applicable statutes, the fraudulent check images, ACH wire files, and interviews, there is probable cause to believe funds on deposit in the subject accounts are proceeds of Bank Fraud and are at risk of being depleted. Therefore, the funds on deposit with Regions Bank in the accounts are subject to seizure and forfeiture to the United States pursuant to 18 U.S.C. Sections 981(a)(1)(C) and 984.

Respectfully Submitted,

Emily Platt
Special Agent
U.S. Secret Service

SONJA F. BIVINS

UNITED STATES MAGISTRATE JUDGE



Certified to be a true and correct copy of the original, Christopher Ekman, U.S. District Court Southern District of Alabama

By: Shannon Davison
Deputy Cleri

Date: February 10, 2025